



August 6, 2012

North Carolina Department of Environment and Natural Resources (NCDENR)
Division of Waste Management – Solid Waste Section
610 East Center Avenue
Mooresville, North Carolina 28115



Attention: Bill Wagner
Environmental Senior Specialist

Reference: February 29, 2012 NCDENR Notice of Deficiency
Lincoln County Landfill (Permit No. 55-03)
Crouse, North Carolina
S&ME Project No. 1356-10-044

Dear Mr. Wagner:

S&ME, Inc. (S&ME), on behalf of Lincoln County, is responding to the referenced Notice of Deficiency regarding methane concentrations at the Lincoln County Landfill. As per the notice, S&ME is aware that Lincoln County is in violation of 15A NCAC 13B .1626(4)(a)(ii) and .1626(4)(c) regarding methane concentrations above the regulatory threshold at the property boundary and the reporting of those concentrations.

The Notice of Deficiency was in regards to the September 1, 2010 NCDENR Facility Compliancy Audit Report in which the County received a Notice of Violation (NOV) regarding methane concentrations exceeding the lower explosive limit in two methane monitoring wells MMW-6 and MMW-7. As a consequence of the violation, Lincoln County was required to submit a remediation plan within 30 days of receipt of the audit report. S&ME, on behalf of Lincoln County responded to the NOV in an October 4, 2010 letter.

The October 4, 2010 letter addressed the nature and extent of the methane gas and the proposed corrective action. In summary, because the unnamed tributary to the west of Area "E" is a natural hydraulic barrier, it is unlikely that methane is migrating off property toward the west. Also, based on historical monitoring data provided by Lincoln County, methane gas has not been detected within the facility's buildings and structures. No corrective action was proposed at that time.

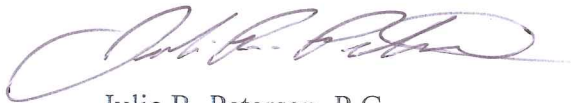
Based on a telephone conversation between Jackie Drummond with NCDENR and Julie Petersen with S&ME on July 9, 2012, Lincoln County will begin monthly methane monitoring immediately at the facility as the proposed Corrective Measure until further

notice from the Solid Waste Section. Also, since the issuance of the NOV, Lincoln County has installed methane gas detectors within the facility's shop building and scale house that provide continuous methane monitoring and alarms if methane concentrations exceed the LEL.

Closing

Please be aware that Lincoln County considers the protection of human health and the environment to be of paramount concern. Lincoln County is committed to providing the resources necessary to address NCDENR's concerns at the Lincoln County Landfill and intends to work closely with NCDENR to address any further issues. Please call us at (704) 523-4726 if you have any questions or comments, or if we can be of further assistance.

Sincerely,
S&ME, Inc.



Julie R. Petersen, P.G.
Project Manager/Senior Geologist



Jack J. Amar, P.E.
Senior Vice President

cc: Mark Bivins - Lincoln County Solid Waste Manager
Don Chamblee, P.E. - Lincoln County Public Works Director
Jackie Drummond - NCDENR Division of Waste Management, Solid Waste Section